

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONALD DIXON, Individually and
as Assignee of Girls Galore, Inc.
d/b/a Allure Gentlemen's Club,**

Plaintiff,

VS.

**UNITED SPECIALTY
INSURANCE COMPANY,**

Defendant.

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CIVIL ACTION

FILE NO.: _____

DEFENDANT’S MOTION FOR JUDGMENT ON THE PLEADINGS

COMES NOW UNITED SPECIALTY INSURANCE COMPANY,
Defendant in the above-styled civil action, and pursuant to Fed. R. Civ. P. 12(c),
files this Motion for Judgment on the Pleadings on the grounds that there are no
disputed issues of material fact as to Plaintiff's claims against Defendant such that
judgment on the pleadings is appropriate as a matter of law.

In support of this Motion, Defendant files concurrently herewith its Memorandum of Law in Support of its Motion for Judgment on the Pleadings.

WHEREFORE, Defendant United Specialty Insurance Company,
respectfully requests that this Court grant its Motion on the Pleadings and for all
other relief just and proper.

This 7th day of February, 2023.

**CRUSER, MITCHELL, NOVITZ,
SANCHEZ, GASTON & ZIMET, LLP**

/s/ Jason G. Wyrick

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CERTIFICATE OF COMPLIANCE

Undersigned counsel certify the foregoing document has been prepared with
one of the font and point selections (Times New Roman, 14 point) approved by the
Court in Local Rule 5.1(C).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned has this day electronically filed the within and foregoing **DEFENDANT’S MOTION FOR JUDGMENT ON THE PLEADINGS** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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Counsel for Plaintiff

This 7th day of February, 2023.

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